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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

Francis Wooters,

Plaintiff,

v.

Experian Information Solutions, Inc. et
 al,

Defendants.

Case No.: 2:22-cv-01691-CDS-BNW

**STIPULATION TO EXTEND
 DEADLINE TO FILE THE
 PROPOSED DISCOVERY PLAN
 AND SCHEDULING ORDER
 (FIRST REQUEST)**

Francis Wooters (“Plaintiff”) and Defendants First National Bank of Omaha, Capital One, N.A., successor-by-merger to Capital One Bank (USA) N.A., and Trans Union, LLC (“Defendants”) (jointly as the “Parties”), by and through their respective counsel, hereby stipulate to extend Local Rule 26-1’s deadline for the parties to hold their initial FED. R. CIV. P. 26(f) conference and to file their proposed discovery plan and scheduling order (the “Deadline”).

Good cause exists to extend the Deadline. The Parties need additional time for counsel to coordinate to set the discovery conference. Additionally, Trans Union’s MLD Motion to Transfer Actions is still pending, and the remaining Parties are engaged in active settlement discussions that may alleviate the need to submit a

1 proposed discovery plan. Therefore, it is appropriate to extend the Deadline for the
 2 Parties to file their proposed discovery plan and scheduling order to allow time for
 3 the Parties to meet and confer in compliance with Local Rule 26-1(b).

4 Parties therefore request to extend the Deadline by 30 days, making the new
 5 deadline for the submission of a stipulated discovery plan and scheduling order on
 6 January 16, 2023. This is the first request for an extension of this deadline.

7 Dated: December 16, 2022.

8 **KIND LAW**

9
 10 /s/ Michael Kind
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Counsel for Plaintiff

14 **JONES LOVELOCK**

15 /s/ Sue Trazig Cavaco
 16 Sue Trazig Cavaco, Esq.
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 20 Las Vegas, Nevada 89119
Counsel for First National Bank of Omaha

21 **MCDONALD CARANO LLP**

22 /s/ Karyna M. Armstrong
 23 Karyna M. Armstrong, Esq.
 24 Jeff Silvestri, Esq.
 25 2300 West Sahara Avenue, Suite 1200
 26 Las Vegas, Nevada 89102
*Counsel for Capital One, N.A. (successor-by-merger to Capital One Bank
 27 (USA), N.A.)*

ORDER

IT IS SO ORDERED

DATED: 4:26 pm, December 19, 2022



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

QUILLING, SELANDER, LOWNDS, WINSLETT & MOSER, P.C.

/s/ Rachael Swernofsky
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